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BRIGGS, and GREGG BUCHWALTER, Individually
And On Behalf Of All Others Similarly Situated

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

RICHARD JACKSON, JULIE BRIGGS,
and GREGG BUCHWALTER, Individually
And On Behalf Of All Others Similarly
Situated,

Plaintiffs,

v.

TWITTER, INC., a Delaware corporation;
GOOGLE, LLC, a limited liability
company; ALPHABET, INC., a Delaware
corporation; FACEBOOK, INC., a
Delaware corporation; INSTAGRAM, INC.,
a Delaware corporation; AMAZON INC. a
Delaware corporation; YOU TUBE, INC., a
Delaware corporation; APPLE, INC., a
Delaware corporation; AMERICAN
FEDERATION OF TEACHERS;
NATIONAL EDUCATION
ASSOCIATION; NATIONAL SCHOOL
BOARD ASSOCIATION; DNC
SERVICES CORPORATION, a corporation
doing business nationwide as "THE
DEMOCRATIC NATIONAL
COMMITTEE,"

Defendants.

CASE NO. 2:22-cv-09438-AB (MAA)

**NOTICE OF LODGING OF AND JULY 4,
2023 MEMORANDUM RULING IN
RELATED CASE GRANTING
PLAINTIFFS' REQUEST FOR A
NATIONWIDE PRELIMINARY
INJUNCTION AGAINST THE FEDERAL
GOVERNMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on July 4, 2023, the United States District
Court for the Western District of Louisiana, Honorable Terry A. Doughty, Judge Presiding, issued

1 a Memorandum Ruling on Plaintiffs’ Request for Preliminary Injunction in a clearly “related”
2 case, *State of Missouri, et al. v. Joseph R. Biden, Jr., et al.*, Case No. 3:22-CV-01213 (“Missouri
3 v. Biden”) (“Memorandum Ruling”). (See Plaintiffs’ April 21, 2023 “Notice of Possible Related
4 Case” (Doc. No. 39). (A true and correct copy of the July 4, 2023 Memorandum Ruling is
5 LODGED herewith).

6
7 Plaintiffs and the Putative Class contend that this landmark Memorandum Ruling
8 (henceforth barring federal officials from making public statements and demands to social media
9 platforms (like defendants Twitter, Inc. and Google herein) and other third party agents and actors
10 (like defendants the AFT, NEA and NSBA) “to induce them to censor disfavored speech and
11 speakers” is directly related to adjudicating the “viewpoint discrimination of political speech”
12 claims asserted by Plaintiffs and the Putative Class in the extant Class Action Complaint against
13 such third-party Government agents and parties.
14

15 As Judge Doughty explained:

16 “The Plaintiffs are likely to succeed on the merits in establishing that the
17 Government has used its power to silence the opposition. Opposition to COVID-19
18 vaccines; opposition to COVID-19 masking and lockdowns; opposition to the lab-leak
19 theory of COVID-19; opposition to the validity of the 2020 election; opposition to
20 President Biden’s policies; statements that the Hunter Biden laptop story was true; and
21 opposition to policies of the government officials in power. All were suppressed. It is
22 quite telling that each example or category of suppressed speech was conservative in
23 nature. The targeted suppression of conservative ideas is a perfect example of ***viewpoint***
24 ***discrimination of political speech***. American citizens have the right to engage in free
25

26 ///

27 ///

1 debate about the significant issues affecting the country.

2 Although this case is still relatively young, and at this stage the Court is only
 3 examining it in terms of Plaintiffs' likelihood of success on the merits, the evidence
 4 produced thus depicts an almost dystopian scenario. During the COVID-19 pandemic, a
 5 period perhaps best characterized by widespread doubt and uncertainty, the United States
 6 Government seems to have assumed a role similar to an Orwellian 'Ministry of Truth.'"¹
 7 (Memorandum Ruling at page 154) (Emphasis Added).

8 Judge Doughty's Memorandum Ruling is directly related to and instructive on
 9 adjudicating the "viewpoint discrimination of political speech" claims asserted by Plaintiffs and
 10 the Putative Class in the Class Action Complaint filed against the named third-party defendants
 11 herein – whom Plaintiffs allege were acting and continue to act as agents of the Government in
 12 censoring and suppressing conservative speech or speech or expression speech they do not like –
 13 namely, speech that is inconsistent with or opposes the political views promulgated by defendant
 14 the Democratic National Committee and the current Biden Administration.
 15
 16
 17

18 DATED: July 5, 2023

LAW OFFICES OF MICHAEL E. REZNICK
 A Professional Corporation

20 By: /s/ Michael E. Reznick

21 Attorney for Plaintiffs RICHARD JACKSON,
 22 JULIE BRIGGS, and GREGORY BUCHWALTER,
 23 individually and on behalf of all others similarly
 24 situated

25
 26
 27 ¹ An "Orwellian Ministry of Truth" refers to the concept presented in George Orwell's dystopian
 28 novel, '1984.' In the novel, the Ministry of Truth is a governmental institution responsible for altering
 historical records and disseminating propaganda to manipulate and control public perception.

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2023, I electronically filed the foregoing document entitled:

**NOTICE OF DISTRICT COURT'S JULY 4, 2023 RULING IN RELATED CASE
GRANTING PRELIMINARY INJUNCTION AGAINST THE FEDERAL
GOVERNMENT**

with the Clerk of the Court for the Central District of California by using the CM/ECF system.

I certify that all parties of record to this appeal either are registered CM/ECF users, or have registered for electronic notice, or have consented in writing to electronic service, and that service will be accomplished through the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and United States of America that the foregoing is true and correct.

Executed on July 5, 2023 at Oak Park, California.

/s/ Michael E. Reznick
Michael E. Reznick